



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

JUL 28 2009

Mr. Gary Kassof
Bridge Program Manager
First Coast Guard District
Battery Building
One South Street
New York, NY 10004

Dear Mr. Kassof:

The Environmental Protection Agency (EPA) has reviewed the draft environmental impact statement (DEIS) for the Goethals Bridge Replacement Project (GBR) (CEQ#20090173) between Staten Island, New York and Elizabeth, New Jersey. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C 7609, PL 91-604 12 (a), 84 Stat. 1709) and the National Environmental Policy Act (NEPA).

The Goethals Bridge, constructed in the 1920s, provides a link over the Arthur Kill along Interstate 278, which begins as U.S. Route 1/9 in Linden, New Jersey, and continues across northern Staten Island as the Staten Island Expressway, and then across the Verrazano Bridge into Brooklyn and Queens. The Port Authority of New York and New Jersey (PANYNJ) owns and operates the Goethals Bridge. The purpose of the proposed project is to eliminate the functional and physical obsolescence of the existing Goethals Bridge, and address the aging structure's escalating maintenance, repair, and structural needs and costs.

In general, EPA finds the DEIS to be a comprehensive document, and that our comments on the preliminary DEIS have been addressed. EPA notes that an interagency mitigation group has been created to identify agency-specific needs for mitigation of wetland impacts associated with the GBR, and that the final design of the bridge will include mitigation to reduce impact to birds flying over the Arthur Kill. Nevertheless, EPA is concerned about the future traffic volumes on ancillary highways and ramps, even with the traffic mitigation presented. We urge the PANYNJ to keep working with federal, state and local transportation agencies to minimize the impacts to the connecting transportation network to the extent possible.

EPA would also like to take this opportunity to encourage the PANYNJ to undertake voluntary initiatives to use clean diesel fuel, emission control devices, and other measures to effectively reduce air pollution emissions during construction and operation of its



facilities. In addition, the use of coal combustion products and recycled industrial materials in lieu of new materials, such as Portland cement, provide environmental benefits by reducing greenhouse gas emissions, solid waste disposal needs and energy use. Additional information on industrial material recycling can be found at www.epa.gov/epawaste/conserves/rrr/imr. EPA also recommends the use of renewable energy for lighting during construction and operation of the new bridge.

EPA has rated the DEIS and all four alternatives as Environmental Concerns – Adequate (EC-1) as the mitigation to impacts to wetlands has not been fully identified. (see enclosed rating sheet). If you have any questions regarding this review or our comments, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

John Filippelli, Chief
Strategic Planning and Multi-Media Programs Branch

Enclosure

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION
Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analysis, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."